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9 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF  
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11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
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14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS  
18 CARDIFF,

19 Defendant.  
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Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.  
COCHELL IN SUPPORT OF  
JASON CARDIFF'S *EX PARTE*  
APPLICATION FOR AN ORDER  
PERMITTING INTERNATIONAL  
TRAVEL AND RETURNING HIS  
PASSPORT**

*[Filed concurrently with Ex Parte  
Application and [Proposed] Order]*

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

1. I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's Ex Parte Application for an Order Permitting International Travel and Returning his Passport.

2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and, placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral. The December 6, 2023 Release Order and Bond Form is attached as Exhibit A.

3. Mr. Cardiff is living with Attorney Cochell in the Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

4. On July 22, 2024, this Court granted a similar motion filed by Mr. Cardiff asking permission to travel to his home in Dublin Ireland and that the Court release his passport and lift his curfew during the time allowed in Ireland. Dkt. 87-2.

5. Mr. Cardiff makes this request to allow Mr. Cardiff to assist his wife, Eunjung Cardiff, with her ongoing medical needs during the time period and to assist their small child. Mr. Cardiff also has schedule necessary medical appointments for himself, including a consultation with his pulmonologist. During the nine months of pretrial release, Mr. Cardiff has consistently complied with all court orders and has previously traveled both domestically and internationally with court approval without incident.

6. Mr. Cardiff previously traveled to assist his wife after she suffered a medical emergency. Mr. Cardiff informs me that he stayed in touch with Mr.

1 Sherrod, his pretrial services officer, during his stay and kept him abreast of his  
2 whereabouts and schedule. Mr. Cardiff returned to the United States without  
3 incident. Mr. Cardiff has traveled on business on a number of occasions, also  
4 without incident and consistent with the Court's prior orders allowing travel.

5 7. On September 3, 2024, I talked directly to Joe Torres, a supervisor at the  
6 Pretrial Services Office in Los Angeles who stated that he is not opposed to Mr.  
7 Cardiff's overseas travel.

8 Mr. Cardiff will return to Texas as scheduled and will maintain regular  
9 contact with Joe Torres, while traveling. Additionally, Mr. Cardiff will supply Mr.  
10 Torres and Pretrial Services with a full travel itinerary prior to his departure.

11 I declare under penalty of perjury under the laws of the United States of  
12 America that the foregoing is true and correct to the best of my knowledge.

13 Executed on this 3d day of September, 2024, at Los Angeles, California.

14  
15 /s/ Stephen R. Cochell  
16 Stephen R. Cochell

17 Dated: September 3, 2024  
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